

29 June 2017

The Chief Executive  
Environment Canterbury  
PO Box 345  
Christchurch 8140

Dear Bill

**Timaru District Council Submission to Canterbury Regional Pest Management Plan 2017-37**

Thank you for the opportunity to comment on the Canterbury Regional Pest Management Plan 2017-37. The Timaru District Council (TDC) does not wish to speak to its submission.

The Council is generally supportive of the strategy and the four key objectives it promotes. We support the intent of the Plan – particularly the focus on new and emerging pests. We note its implications for TDC as a landowner/occupier and a road controlling authority.

We offer the following specific comments:

**1) Formed Road Reserve Management – Pest Management**

We note the discussion on pages 12-13 of the plan on the management of pests on Formed Road Reserves. This includes a table that identifies who has responsibility across the region, being either the Road Controlling Authority or adjacent land occupier<sup>1</sup>.

The document states “...*this mixed approach to road reserve pest management is the result of previous reviews of the Strategy and districts seeking local approaches to pest and road reserve management. Some road controlling authorities have indicated a willingness to take on the responsibility while others prefer existing arrangements to remain that acknowledge the different farming practices as well as general maintenance responsibilities...*”<sup>2</sup>.

While we accept this is currently the case, we wonder about the inconsistency of this approach as well as the impact on those Territorial Authorities (TAs) that have accepted this responsibility. We question whether this is a reasonable way forward and its effectiveness as a sustainable, long-term approach to achieve the objectives of the plan, particularly in light of the length of time the plan is operative.

---

<sup>1</sup> We also understand that Ashburton, Mackenzie and Waimate District Councils all do this work as part of their existing road maintenance contracts, so are not sure that this table is totally accurate.

<sup>2</sup> Proposal for the Canterbury Regional Pest Management Plan 2017-2037, p.12

We note aspects of this issue were raised, as noted in your Stakeholder Engagement Summary, specifically:

- “- Managing pest on roadsides and the transport of pests through gravel extraction/use in relation to roading*
- The tension between protecting native vegetation on roadsides and impact from adjoining land occupiers having responsibility for pest management...*
- .....The management of road reserves.”<sup>3</sup>*

However, there does not appear to have been any real consideration of how to address these issues, apart from maintaining the status quo.

We estimate that Timaru District Council spends around \$20,000 per year on this work, funded by Timaru District ratepayers. We question the effectiveness and fairness of this region-wide, where some of the region’s ratepayers are paying for this directly, whereas others are not. We also question the effectiveness of two distinct types of agencies (i.e. TAs and adjacent occupiers) carrying out this work, with differing motivations and funding sources.

We believe that the management of road reserve pests should be either one or the other – managed by TAs or by adjacent land occupiers - to enable application of a more consistent approach, the use of common practices and standards and employ a consistent monitoring regime. Any management approach needs to ensure that the recovery of costs recognises an appropriate split between public and private good.

*Recommendation: That a more consistent approach is developed to the issue of pest management on formed road reserves*

## **2) Bennetts Wallaby**

In our earlier submission on the Regional Pest Management Strategy Discussion Document, we indicated a preference for a Progressive Containment Programme for Bennetts Wallaby. We note that the proposed plan recommends a Sustained Control Programme.

This pest remains of particular concern in our district. While we acknowledge the need to prioritise pest management needs and limited available resources, we still support a more aggressive approach towards the management of these pests, represented by a progressive containment programme. As mentioned in our earlier submission, we would support the possibility of a targeted rate to improve wallaby management

*Recommendation: That a Progressive Containment programme is applied to the management of Bennetts Wallaby.*

Yours sincerely



**Bede Carran**  
**Chief Executive**

---

<sup>3</sup> Stakeholder Engagement Summary Report - Proposal for the Canterbury Regional Pest Management Plan 2017-2037, p.3